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ADMITTED NY

May 9, 2022

BY EMAIL & HAND

A.U.S.A. Artie McConnell
A.U.S.A. Mark Misorek
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Jordan, et al.*, 20-CR-305 (LDH)

Counsel:

I represent defendant Mr. Karl Jordan, Jr., in the above-referenced case.

I write this letter pursuant to your ongoing obligations to turn over discovery related to this case. As you are aware, your office is under a continuing duty to disclose *Brady* and Rule 16 materials as you become aware of them. Various items of evidence obtained from the crime scene located at 90-10 Merrick Blvd, Jamaica, N.Y. 11432 have not been turned over to the defense as part of the government's discovery obligations.

Discovery and inspection of the items described below is both reasonable and necessary to the preparation of the defense. Our request for discovery and inspection relates to items in the possession, custody, or control of the United States Attorney as well as all federal, state and city agencies or governmental entities over which it has sufficient control or liaison to obtain access to materials possessed by such agency or entity. With respect to those items which we request, if the United States Attorney does not have them in its possession, we ask for a statement to the effect that such items do not exist or are not in the United States Attorney's possession. If the United States Attorney is aware that a requested item exists but does not have it in its possession, then we request that the United States Attorney disclose the whereabouts of the item.

The government is requested to turn over¹ the evidence from the following items recovered from the crime scene²:

1. Video Tape Surveillance

¹The defendant further requests that the government permit him to inspect and copy or photograph such evidence.

²The relevant documents listing the evidence described in this letter request recovered from the crime scene are at bates 52-56, and 100-103.

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2. Hard Drive
3. Assorted Business Records
4. Compaq Presario Tower
5. External Disk Drive
6. External Floppy Drive
7. Compaq Armada Laptop Computer
8. Apple Laptop Computer
9. Plastic Holders containing floppy disks
10. "GE" answering machine
11. "iomega" CD-RW drive
12. Black cords

Defense counsel seeks the right to inspect those items discoverable under Rule 16. Additionally, the government is requested to produce all discoverable evidence and documents not listed above that have not yet been turned over the defense.

Thank you for your attention to these matters.

Sincerely,

/s/Michael Hueston

cc: Clerk of the Court